

FILED

MAY - 1 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELANDIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD SEAWRIGHT,

Defendant.

) INDICTMENT

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1:24 CR 00150

CASE NO.

Title 18, United States Code,
Sections 922(a)(1)(A),
924(a)(1)(D), and 922(a)(6)**JUDGE POLSTER**COUNT 1(Engaging in the Business of Importing, Manufacturing, or Dealing in Firearms Without a
Federal Firearms License, 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D))

The Grand Jury charges:

1. From on or about April 17, 2018, to on or about December 12, 2022, in the Northern District of Ohio, Eastern Division, Defendant RICHARD SEAWRIGHT, not being a licensed importer, licensed manufacturer, or licensed dealer, did willfully engage in the business of importing, manufacturing, or dealing in firearms, those being:

DATE	FIREARM	PRICE
4/17/18	S&W, Model SD9VE, 9mm pistol, serial number FZK3812	\$365.00
11/5/18	Taurus, Model G2C, 9mm pistol, serial number TLO89171	\$275.00
11/5/18	Taurus, Model PT140G2C, .40 caliber pistol, serial number SLW95833	\$300.00
7/16/20	Glock, Model 45, 9mm caliber pistol, serial number BNLC331	\$589.99
9/18/20	S&W, Model SD9VE, 9mm caliber pistol, serial number FCN2537	\$349.99
9/25/20	Glock, Model 19, 9mm pistol, serial number BPWH736	Unknown
11/13/20	Glock, Model 17, 9mm pistol, serial number BRMM534	\$499.99
11/22/20	Glock, Model 45, 9mm pistol, serial number BRKW173	\$589.99
3/13/21	Taurus, Model G3C, 9mm caliber pistol, serial number ACB526532	\$229.99
3/13/21	Taurus, G2C, .40 caliber pistol, serial number ACB530432	\$299.99

5/25/21	Andro Corp., Model ACI-15, 5.56 caliber pistol, serial number J2-012565	\$865.00
9/15/21	Glock, Model 45, 9mm caliber pistol, serial number BUFC635	\$625.00
12/14/21	Glock, Model 43X, 9mm caliber pistol, serial number BUEK931	\$536.24
3/25/22	Glock, Model 29, 10 mm caliber pistol, serial number BMWW257	\$549.99
4/1/22	Canik, Model TP9Elite SC, 9mm caliber pistol, serial number 22CB04744	\$399.00
4/6/22	Glock, Model 22, .40 caliber pistol, serial number BWMU349	\$559.99
4/12/22	Taurus, Model G2C, .40 caliber pistol, serial number ADB973974	\$269.99
6/1/22	Taurus, Model PT111G2A, 9mm caliber pistol, serial number 1C118124	\$219.99
6/30/22	Glock, Model 19, 9mm caliber pistol, serial number BUBT728	\$549.99
6/30/22	Glock, Model 23, .40 caliber pistol, serial number BUGF190	\$475.00
7/5/22	Taurus, Model PT111G2A, 9mm caliber pistol, serial number 1C118763	\$219.99
7/14/22	Taurus, Model PT111 G2A, 9mm caliber pistol, serial number ABB277192	\$220.00
7/14/22	Smith & Wesson, Model SD9VE, 9mm caliber pistol, serial number FYM2278	\$185.00
7/22/22	Glock, Model 19X, 9mm caliber pistol, serial number BWSY366	\$589.99
7/22/22	Glock, Model 17, 9mm caliber pistol, serial number BVBT823	\$475.00
7/22/22	Canik, Model 55, 9mm caliber pistol, serial number 22CB02857	\$399.99
7/29/22	Pioneer Arms, Model Hellpup, 7.62X39 caliber pistol, serial number PAC1172082	\$50.00
8/20/22	Smith & Wesson, Model M&P M2.0, 10 mm caliber pistol, serial number NMD5311	\$599.99
8/29/22	Glock, Model 45, 9mm caliber pistol, serial number BHZL539	\$600.00
9/15/22	Taurus, Model G3C, 9mm caliber pistol, serial number ADB003441	\$249.99
9/21/22	Glock, Model 29, 10mm caliber pistol, serial number BXHT975	\$579.99
10/8/22	Palmetto State Armory, Model Dagger, 9mm frame, serial number JJE32557	\$99.99
11/6/22	Glock, Model 17, 9mm pistol, serial number BUAB317	\$250.00
11/15/22	PSA, Model Dagger, compact frame, serial number JJE19646	\$99.99
12/10/22	PSA, Model 5.7 Rock, 57 caliber pistol, serial number RC004729	\$149.99
12/12/22	Canik, Model TP9 Elite SC, 9mm pistol, serial number 22CB32928	\$349.99

all having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(a)(1)(A), and 924(a)(1)(D).

COUNT 2

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. § 922(a)(6))

The Grand Jury further charges:

2. On or about November 22, 2020, in the Northern District of Ohio, Eastern Division, Defendant RICHARD SEAWRIGHT, in connection with the acquisition of a firearm, to wit: a Glock, Model: 45, 9mm pistol, bearing serial number: BRKW173, from Fin Feather Fur Outfitters, located at 18030 Bagley Rd., Middleburg Heights, Ohio 44130, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, an ATF Form 4473, that he was the actual buyer of said firearm, when in fact, he was not the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 3

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. § 922(a)(6))

The Grand Jury further charges:

3. On or about August 20, 2022, in the Northern District of Ohio, Eastern Division, Defendant RICHARD SEAWRIGHT, in connection with the acquisition of a firearm, to wit: a Smith & Wesson, Model: M&P 10 M2.0, 10mm pistol, bearing serial number: NMD5311, from Fin Feather Fur Outfitters, located at 18030 Bagley Rd., Middleburg Heights, Ohio 44130, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of

Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearm, when in fact, he was not the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 3 are incorporated herein by reference. As a result of the foregoing offenses, Defendant RICHARD SEAWRIGHT shall forfeit to the United States all firearms and ammunition, involved in, or used in the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.